

March 5, 2007

Ms. Amy M. Bennett  
Standards Coordinator  
Bureau of Water  
South Carolina Department of Health  
and Environmental Control  
2600 Bull Street  
Columbia, SC 29201

Re: Triennial Review of South Carolina Regulation 61-68, *Water Classification and Standards*  
and South Carolina Regulation 61-69, *Classified Waters*

Dear Ms. Bennett:

The following comments are provided on behalf of the South Carolina Manufacturers Alliance (SCMA) Environmental Committee. Proposed changes are being conducted as part of an effort that SCDHEC is undertaking to amend specific sections of R.61-68, *Water Classifications and Standards*, and sections of R.61-69, *Classified Waters*.

The current numeric water quality criterion for Manganese for organism consumption is 100 µg/L. According to R. 61-68, this criterion is based on the EPA's recommended values in the Gold Book. We believe that the application of this criterion to freshwater aquatic life is not appropriate since, in the Gold Book, the criterion was only recommended to apply to the protection of consumers of marine mollusks and not the consumers of freshwater aquatic life. The recommended criteria are stated as follows in the Gold Book rationale:

**Criteria:**

**50 ug/L for domestic water supplies (welfare):**

**100 ug/L for protection of consumers of marine mollusks.**

In the text of the Gold Book rationale, the authors provide more detail:

**The major problem with manganese may be concentration in the edible portions of mollusks, as bioaccumulation factors as high as 12,000 have been reported (NAS, 1974). In order to protect against a possible health hazard to humans by manganese accumulation in shellfish, a criterion of 100 ug/L is recommended for marine water.**

At no point in the rationale is this criterion recommended for protection for consumers of freshwater aquatic life. In fact, the Gold Book states that, "Manganese is not considered to be a problem in fresh waters."

As a result, we believe that application of this criterion to freshwater streams is not supported by any scientifically demonstrated need for the protection of consumers of the aquatic life in those streams. To avoid misapplication of the criterion, we recommend that the Department add a footnote to this criterion in R.61-68 that specifies that it applies only to discharges to marine water.

Thank you for this opportunity to provide comments in this very important rule making process.  
If you have any questions, please feel free to call me at (803) 799-9695.

Sincerely,

Sara N. Hopper  
Director of Government Relations